

National Aeronautics and Space Administration
Goddard Space Flight Center
Greenbelt, MD 20771



April 30, 2012

Reply to Attn of: 140

TO: Distribution

FROM: 140/Chief Counsel

SUBJECT: Widely Attended Gathering Determination Regarding Attendance at Aqua Reception

On May 4, 2012, NASA Goddard Space Flight Center is hosting an event recognizing the 10th anniversary of Aqua, one of NASA's major Earth-orbiting satellites studying the Earth's water cycle. The event will be held at the Goddard Visitor Center and will include a reception and remarks from key individuals involved in the Aqua mission, both past and present.

Northrop Grumman is sponsoring the reception. Approximately 200 people have been invited to attend the event, representing NASA, universities, and industry. The estimated cost per person is \$30. Northrop Grumman will also distribute a commemorative 2 in 1 pen/stylus with an estimated value around \$5 each.

Attendance at the event will allow NASA employees an opportunity to discuss Aqua's contributions to science and our understanding of the Earth with other attendees from government, universities, science organizations, and industry. I therefore conclude that NASA's interest in its employees attending this event outweighs any concern that attendance may, or may appear to, improperly influence NASA employees in the performance of their official duties.

Based on the above, I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR 2635.204(g). Accordingly, NASA employees whose duties do not substantially affect Northrop Grumman may accept free attendance to the event for themselves and their guests, as well as the pen/stylus.

However, NASA employees who are in non-career positions in which Executive Order 13490 requires signing an ethics pledge may only attend if they reimburse Northrop Grumman the cost of refreshments consumed by themselves and their accompanying guests and the cost of the pen/stylus if accepted. Moreover, NASA employees whose

duties substantially affect Northrop Grumman, for instance by way of procurement duties, should seek an individual determination regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Robert M. Stephens", with a long horizontal flourish extending to the right.

Robert M. Stephens